

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

NICOLE JENNINGS WADE,  
JONATHAN D. GRUNBERG, and  
G. TAYLOR WILSON,

Plaintiffs,

v.

L. LIN WOOD,

Defendant.

Case No. 1:22-CV-01073

**NOTICE OF INTENT TO ISSUE SUBPOENAS**

Pursuant to Rule 45 of the Federal Rules of Civil Procedure, Plaintiffs hereby notify the Court and all counsel of record that they propose to issue the following witness subpoenas on August 5, 2023 to following persons or entities:

1. Amended Subpoena of L. Lin Wood.

True and correct copies of the foregoing proposed subpoenas are attached hereto as Exhibit 1.

Respectfully submitted this 7<sup>th</sup> day of August 2024.

/s/ Milinda L. Brown  
Andrew M. Beal  
Georgia Bar No. 043842  
Milinda L. Brown  
Georgia Bar No. 363307

BEAL, SUTHERLAND,  
BERLIN & BROWN, LLC  
945 East Paces Ferry Road, NE  
Suite 2000  
Atlanta, GA 30326  
678-439-0330  
drew@beal.law  
milinda@beal.law

**CERTIFICATE OF COMPLIANCE**

The undersigned counsel certifies that the foregoing has been prepared in Times New Roman (14 point) font, as approved by the Court in LR 5.1C.

/s/ Milinda L. Brown  
Andrew M. Beal  
Georgia Bar No. 043842  
Milinda L. Brown  
Georgia Bar No. 363307  
*Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that on this date I electronically filed the foregoing **Notice of Intent to Issue Subpoena** with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing all attorneys of record.

/s/ Milinda L. Brown  
Andrew M. Beal  
Georgia Bar No. 043842  
Milinda L. Brown  
Georgia Bar No. 363307

# **EXHIBIT “1”**

AO 88 (Rev. 02/14) Subpoena to Appear and Testify at a Hearing or Trial in a Civil Action

**UNITED STATES DISTRICT COURT**  
for the  
Northern District of Georgia

Wade, et. al.

Plaintiff

v.

L. Lin Wood

Defendant

Civil Action No. 1:22CV1073

**SUBPOENA TO APPEAR AND TESTIFY  
AT A HEARING OR TRIAL IN A CIVIL ACTION**

To: L. Lin Wood, Defendant

(Name of person to whom this subpoena is directed)

**YOU ARE COMMANDED** to appear in the United States district court at the time, date, and place set forth below to testify at a hearing or trial in this civil action. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place: United States Courthouse 75 Ted Turner Drive Atlanta, Georgia 30303-3309	Courtroom No.: 1906 Date and Time: August 9, 9:00 a.m.
---	---

You must also bring with you the following documents, electronically stored information, or objects (*leave blank if not applicable*):

See attached Exhibit "A"

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: August 7, 2024 — CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

  
Attorney's signature
The name, address, e-mail address, and telephone number of the attorney representing (name of party) Plaintiffs

, who issues or requests this subpoena, are:

Andrew Beal, Milinda Brown; Beal Sutherland Berlin & Brown, LLC, 2200 Century Parkway, Suite 100, Atlanta, GA 30350; telephone: (678) 439-0330; drew@beal.law, milinda@beal.law

**Notice to the person who issues or requests this subpoena**

If this subpoena commands the production of documents, electronically stored information, or tangible things before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

**Exhibit A**  
**Amended Subpoena to**  
**L. Lin Wood**

- 1. Current statements for each and every banking, retirement, and brokerage account owned by you or in which you have an interest;**
- 2. All personal financial statements created by you or on your behalf beginning January 1, 2022 to date; and**
- 3. All credit and loan applications submitted by you or on your behalf to any financial institution beginning January 1, 2022 to date.**

AO 88 (Rev. 02/14) Subpoena to Appear and Testify at a Hearing or Trial in a Civil Action (page 2)

Civil Action No. 1:22CV1073

**PROOF OF SERVICE**

*(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)*

I received this subpoena for *(name of individual and title, if any)* \_\_\_\_\_  
on *(date)* \_\_\_\_\_.

☐ I served the subpoena by delivering a copy to the named person as follows: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_ on *(date)* \_\_\_\_\_; or

☐ I returned the subpoena unexecuted because: \_\_\_\_\_  
\_\_\_\_\_.

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also  
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of  
\$ \_\_\_\_\_.

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ 0.00.

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_  
\_\_\_\_\_  
*Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information regarding attempted service, etc.: